

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

IN RE:

ALDEN H. ZUHLKE and
LISA A. ZUHLKE,

Debtors.

PHILIP M. KELLY, CHAPTER 7 TRUSTEE,

Plaintiff,

v.

ALDEN H. ZUHLKE, LISA A. ZUHLKE,
DEREK A. ZUHLKE and KIMBERLY A.
ZUHLKE, DILLAN A. ZUHLKE and
MICHELLE L. ZUHLKE,

Defendants.

Case No. BK 24-40267-BSK
(Chapter 7)

ADV PRO. No. 24-4011

**MOTION TO EXTEND EXPERT
WITNESS DISCLOSURE DEADLINE**

Defendants, Derek and Kimberly Zuhlke and Dillan and Michelle Zuhlke (collectively referred to as the “Zuhlkes”) by and through their undersigned counsel, and hereby request an extension of the Zulkas’ expert witness disclosure deadline an additional forty-five (45) days or through March 15, 2025. In support of said Motion, the Zuhlkes state as follows:

1. On November 12, 2024, Plaintiff and the Zulkas (the “Parties”) filed a Joint Preliminary Pretrial Statement in the above-referenced adversary proceeding in which they agreed to disclosure and exchange of all expert reports by February 1, 2025. (Doc. 24)

2. Discovery is ongoing in this matter, with third-party depositions beginning the last week of January 2025. It is anticipated that some of the deposition testimony in those depositions may be relevant to matters on which Defendants’ expert will opine.

3. In addition, Defendants' anticipated expert has advised that due to his current workload additional time is necessary to formulate his opinions.

4. No party will be prejudiced by the extension, and Defendants are agreeable to Plaintiff obtaining the same extension.

WHEREFORE the Parties request that the Court extend the deadline for disclosure and exchange of all expert reports from February 1, 2025, until and including March 15, 2025, and grant such other and further relief as may be just and equitable.

DATED this 10th day of January, 2025.

DEREK A. ZUHLKE and KIMBERLY A.
ZUHLKE, and DILLAN A. ZUHLKE and
MICHELLE L. ZUHLKE Defendants

By: /s/ Lauren R. Goodman

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ATTORNEY FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 10th day of January, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties of record.

/s/ Lauren R. Goodman

Lauren R. Goodman